

failure. The proposed changes to the action requirements will not change the response of the DGs to an LNP. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The requirement contained in the second footnote (**) to Technical Specification 3.8.1.1 to allow a one time extension of the allowed outage time to 7 days will be deleted. This provision is no longer necessary since the Millstone Unit No. 1 work has been completed. The statements that a successful test of the DG performed for the current Action Statements c, d, or e will satisfy the required testing of Action States a or b are no longer necessary with the proposed changes. These statements will be deleted. The removal of these items will not change the response of the DGs to an LNP. Therefore, these proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed changes to the DG surveillance requirements will allow an engine prelube period before all DG tests starts, allow slow starting of the DGs, and allow the DGs to be loaded in accordance with manufacturer recommendations. This will decrease the wear on the DGs. The proposed changes will also allow adequate time for the completion of all manufacturer recommended DG engine prelube procedures. Modifying starting and loading requirements, consistent with the manufacturer recommendations, is intended to enhance diesel reliability by minimizing severe test conditions which can lead to premature failures. In addition, specifying that the 184 day DG SRs [surveillance requirements] will satisfy the 31 day DG starting and loading SRs will eliminate redundant testing. These proposed changes will minimize unnecessary DG testing while maintaining DG reliability. The proposed changes will not change the response of the DGs to an LNP. Therefore, these changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The ASTM [American Society for Testing and Materials] standards referenced for diesel fuel oil sampling will be modified in SR 4.8.1.1.2.b. The proposed changes will replace an outdated standard, and will remove the year of issuance or revision from the ASTM standards referenced. This will allow use of the current approved ASTM standard. These proposed changes do not affect the sampling frequency or acceptance criteria of this SR. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed wording changes to eliminate any possible confusion when SRs 4.8.1.1.1 and 4.8.1.1.2 are referenced by SR 4.8.1.2, to state that the DGs start from standby conditions instead of ambient conditions, and to remove the requirement to perform a DG surveillance only during shutdown will not affect any technical aspect of the SRs. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

SRs will be added to test the DGs every 184 days at conditions similar to the current 31 day SRs. These conditions are more restrictive than the new proposed 31 day SRs. The 184 day SRs will require the diesel generators to start and obtain speed and voltage within 15 seconds and will also require the diesel generators to be synchronized, loaded, and to maintain the load for at least 60 minutes. However, it will allow gradual loading, based on manufacturer recommendations, to be used. A 184 day surveillance interval is sufficient to verify DG fast-start capability, and is consistent with GL [Generic Letter] 84-15, GL 93-05, and NUREG-1432. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The list of SRs, contained in SR 4.8.1.2, that do not have to be performed for the operable diesel generator in Modes 5 and 6 will be expanded to take into account the 184 day DG SR that will be added. This proposed change will exclude the one operable DG from being loaded when the 184 day SR is performed. This is consistent with the current SR which excludes performance of SR 4.8.1.1.2.a.3. Loading the one required operable diesel generator could subject this diesel generator to grid faults which could adversely affect its ability to perform its safety function. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The Bases of these Technical Specifications will be modified and expanded to discuss the proposed changes, and to provide guidance to ensure the requirements are correctly applied. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

These proposed changes do not alter the way any structure, system, or component functions. The intent of the proposed changes is to improve the reliability of the DGs by eliminating unnecessary surveillance testing and allowing most of the surveillance testing to be performed in accordance with the recommendations of the manufacturer. There will be no adverse effect on equipment important to safety. The response of the DGs to an LNP, as described in the Millstone Unit No. 2 FSAR [Final Safety Analysis Report], will remain the same. There will be no effect on any of the design basis accidents previously evaluated. Therefore, this License Amendment Request will not result in a significant increase in the probability or consequences of an accident previously analyzed.

2. Create the possibility of a new or different kind of an accident from any accident previously evaluated.

The proposed changes do not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The proposed changes do not introduce any new failure modes. Therefore, the proposed

changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in the margin of safety.

This License Amendment Request proposes to modify the LCOs for electrical power sources, DG surveillance requirements and the required actions for inoperable electrical power sources contained in the Millstone Unit No. 2 Technical Specifications. The proposed changes will revise LCO wording to be consistent with the required offsite power distribution requirements and improve DG reliability by minimizing excessive wear of the DGs, and changing the starting and loading requirements of the DGs, in accordance with manufacturer recommendations, during most DG surveillance and operability tests. Improving the reliability of the DGs will help ensure the DGs will respond to an LNP as described in the Millstone Unit No. 2 FSAR. Therefore, this License Amendment Request will not result in a significant reduction in the margin of safety as defined in the Bases for the Technical Specifications addressed by the proposed changes.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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Northeast Nuclear Energy Company, et al., Docket No. 50-336, Millstone Nuclear Power Station, Unit No. 2, New London County, Connecticut

Date of amendment request: July 21, 1998.

Description of amendment request: The proposed amendment would change the Technical Specifications (TS) by changing various Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) setpoints and allowable values; correct the specified maximum reactor power level limited by the high power level RPS trip; add new TS and requirements associated with the automatic isolation of steam generator blowdown; and make several editorial and changes to correct various errors